

Natrona County, Wyoming

Chapter 7 Update for the Natrona County Development Plan

Preliminary Draft

January 17, 2020

Prepared for:
the Natrona County Board of County Commissioners

Prepared by:
Ecosystem Research Group,
a DJ&A Company



Contents

Preface.....	3
Introduction	1
Purpose and Intent of this Plan	1
Legal Framework.....	2
Organization	4
Chapter 1: Custom and Culture.....	6
Chapter 2: Land Use	8
Land Use.....	8
Land Access	9
Wilderness and Other Special Land Use Designations.....	9
Fire Management.....	10
Forest Management.....	10
Chapter 3: Geology, Mining and Air	12
Mining	12
Energy Resources	12
Mining and Mineral Resources	12
Air Quality	15
Soils	17
Chapter 4: Water Resources	18
Irrigation and Related Infrastructure	18
Dams and Reservoirs.....	18
Water Rights.....	18
Water Quality.....	19
Flood Plains	20
Rivers and Streams.....	20
Wetlands	20
Riparian Areas	20
Wild and Scenic Rivers	20
Chapter 5: Wildlife and Fisheries	21
Fisheries	21
Threatened, Endangered, and Sensitive Species	21
Wildlife	21
Predator Control	22
Wild Horses and Burros	23
Invasive Species.....	23
Chapter 6: Economics & Society.....	24
Recreation and Tourism.....	24
Law Enforcement	25
Cultural, Historical, Geological, and Paleontological Resources.....	25
Economic Considerations.....	26
Chapter 7: Agriculture	29
Livestock and Grazing	29
Noxious Weeds	30

References Cited31

List of Appendices32

 Appendix I 32

 Appendix II 32

 Appendix III 32

DRAFT

Preface

This current draft document is a component of the overall completion of a Natrona County Natural Resource Management Plan. The existing 2016 Natrona County Development Plan consists of seven chapters that describe a variety of aspects of the county as a whole, including discussion on the impacts and influences of public land:

- Chapter 1: Background and Introduction
- Chapter 2: Goals, Policies, Actions
- Chapter 3: Employment and Demographic Profile
- Chapter 4: Report of Inventory
- Chapter 5: Growth Management Area
- Chapter 6: Rural Area Plan
- Chapter 7: Federal and State Land Use Policy

As directed by the Natrona County Board of Commissioners, Chapter 7: Federal and State Land Use Policy will be amended to include discussion on the listed resources within the plan, resources outlined in the template if relevant to the county, and resources identified by the Commission or the public. In addition, custom and culture, specifically as it relates resources, values, and economics, will be discussed within this revised Chapter 7.

In this Draft Natrona County Natural Resource Management Plan, *red italicized language* denotes our recommendations or suggestions to consider within the plan. Additionally, language throughout this draft plan has been taken directly from the Natrona County Development Plan (NCDP). These existing policy statements represent a starting point for this updated Natural Resource Management Plan but should not be considered necessary components of this plan. Resource Management Objectives and Priorities will likely be edited to reflect Natrona County's current values and goals. Please note that empty Resource Assessment or Resource Management Objective sections simply indicate that these statements are not included in the current NCDP.

Introduction

The WCCA template Introduction was supplemented to expand upon existing themes and ideas.

A Natural Resource Management Plan (NRMP), a form of land use planning (LUP), is a document that serves as the basis for communicating and coordinating with the federal government and its agencies on land and natural resource management issues on public lands that influence the local area and economy. Understanding that rural counties can be strongly impacted by federal land management decisions on public lands located within, or adjacent to, the county, local governments can ensure that local policies and concerns are meaningfully considered by federal agencies through formally adopting a NRMP.

While local governments do not have jurisdiction over the federal government or federal lands, various federal and state statutes dictate the requirements and parameters for how federal agencies engage with local entities during decision-making processes. This can include local governments serving as a “cooperating agency” during project planning as an Interdisciplinary (ID) Team member or providing local expertise and information for areas of statutory responsibility. Additionally, both the National Environmental Policy Act (NEPA) and the Federal Land Policy and Management Act (FLPMA) require a federal “consistency review” of the planning effort or project with the local policies, plans, or laws adopted by the local government (Budd-Falen Law Office 2018).

Counties are particularly well-suited to understand the impacts that federal land management decisions may have on the local economy, custom, and culture. Under Wyoming Statute § 18-5-208(a), a county is “deemed to have special expertise on all subject matters for which it has statutory responsibility, including but not limited to, all subject matters directly or indirectly related to the health, safety, welfare, custom, culture and socio-economic viability of a county.”

Purpose and Intent of this Plan

We recommend the Commission stating the intent of this document and goals for how this document should be used.

The purpose of this plan is to establish the custom and culture of the local area, identify resources or land uses that economically or culturally impact the stability and character of the county, and recognize the importance of local involvement in federal decision making.

In adopting this NRMP, the Board of County Commissioners intends to:

- Maintain or expand upon the culture, customs, heritage, and economic diversity of resource-based industries within the local economy, while balancing the integrity of local natural resources, wildlife, and environmental quality;
- Promote the understanding of the history, dynamics, and benefits from uses of public lands within the county from activities such as agriculture, recreation, and other multiple-uses;
- Recognize and protect privacy rights and interests in federal and state land resources including, but not limited to, rights-of-way, grazing permits, water rights, special use permits, leases, contracts, and recreation permits and licenses;

- Minimize conflicts between land uses; and
- Promote a robust, diverse and stable local economy.

The Board of County Commissioners also acknowledges that comprehensive and responsible management of local natural resources requires equal effort and participation of all parties involved, including local, state and federal. In order to encourage this relationship, the Board will:

- Inform the federal agencies of the date, time, and location of their regularly scheduled meetings with an open invitation that federal agency personnel should attend such meetings if there are issues to discuss. Meetings will be scheduled on a biannual basis.
- Transmit a copy of this plan to the state, regional, and local federal agency offices doing business within the county for their consideration as part of any consistency review that is required pursuant to federal statute.
- Contact the Bureau of Land Management (BLM) and the U.S. Forest Service (USFS) offices to determine a protocol for informal communication that should occur so that each is apprised of issues and concerns as early as possible.
- Review NEPA documents to determine if they will request “cooperating agency status” and will consider entering into Memorandums of Understanding (MOU) or Memorandums of Agreement (MOA) as appropriate. The District and the County reserve the right to negotiate an MOU or MOA on a case-by-case basis, although an MOU or MOA is not appropriate nor necessary in all cases.

Legal Framework

We recommend separating the “Legal Framework” and “Purpose” sections, as shown here. This makes the explanation of statutory requirements easy to find and separates them from the purpose described above.

Federal statutes provide opportunities for counties to share their own special expertise with federal agencies during decision-making processes in order to protect the local custom and culture, tax base, and private property. NRMPs establish the current economic and cultural conditions and the desired future conditions of an area, and illustrate how those conditions are linked with activities that occur on adjoining public lands. Specifically, federal laws require federal agencies, including the BLM and USFS, to consider state and local land use plans and to explain deviations from these plans in decision documents per the following statutes:

The National Environmental Policy Act (NEPA)

NEPA and its implementing regulations under the Council of Environmental Quality (CEQ) require all federal agencies to address inconsistencies between a proposed action and State and local plans, and address the extent to which the agency would harmonize its proposed action with the local law or plan (40 C.F.R. § 1506.2). Consistency review and cooperating agency status are each provisions that allow local voice within federal planning:

In order to participate in the federal agency’s consistency review process, an adopted local plan is required. Provided that the local government submits the local plan to the agency in the course of

writing an Environmental Impact Statement (EIS) or Environmental Assessment (EA), the federal agency is required to

discuss any inconsistency of a proposed action with any approved State or local plan and laws (whether or not federally sanctioned). Where an inconsistency exists, the [environmental impact] statement should describe the extent to which the [federal] agency would reconcile its proposed action with the [local government] plan or law (40 C.F.R. §§ 1506.2, 1506.2(d)).

Local governments can also participate in the NEPA process as a “cooperating agency”, which is defined as: “any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment.” (40 C.F.R. § 1508.5). As a cooperating agency, the local government would be involved in the federal process at its inception and participate in the NEPA process, such as during scoping and drafting portions of the NEPA document (40 C.F.R. § 1501.6(b)).

CEQ regulations (40 C.F.R. § 1501.6(b)(3)) also permit a cooperating agency to “assume on request of the lead agency, responsibility for developing information and preparing environmental analyses including portions of the environmental impact statement concerning which the cooperating agency has special expertise.”

In short, federal agencies are required to cooperate with State and local agencies to reduce duplication between NEPA and comparable local requirements (40 C.F.R. § 1506.2(b)). By adopting a local NRMP, a county (1) ensures that local policies are considered during a federal agency’s consistency review process, and (2) demonstrates the special expertise required for participation in the NEPA process as a cooperating agency (if desired by the county).

The Federal Land Policy Management Act (FLPMA)

FLPMA, BLM’s guiding statute, requires BLM to coordinate their land use plans with local and state government land use plans, providing that BLM’s plans “shall be consistent with State and local plans to the maximum extent [the Agency] finds consistent with Federal law and the purposes of this Act.” (43 U.S.C. § 1712(c)(9)).

Specifically, FLPMA requires that the BLM:

- Stays apprised of local land use plans;
- Assures that consideration is given to those local land use plans that are germane in the development of land use plans for public lands;
- Assists in resolving, to the extent practical, inconsistencies between Federal and local land use plans;
- Provides for meaningful public involvement of local government officials in the development of land use programs, land use regulations, and land use decisions for public lands, including early public notice of proposed decisions which may have a significant impact on non-Federal lands. (43 U.S.C. § 1712(c)(9)).

BLM has also adopted *A Desk Guide to Cooperating Agency Relationships and Coordination with Intergovernmental Partners* (2012) that guides the BLM through the legal, regulatory, and planning roles when involved in a cooperating agency relationship.

The National Forest Management Act (NFMA)

NFMA requires the USFS to coordinate National Forest land and resource plans with “the land and resource management planning processes of State and local governments and other Federal agencies[.]” (16 U.S.C. § 1604(a)). While the USFS is not required to comply with State and local plans, a final decision document must contain results of a review of local plans, including consideration of objectives, the compatibility and interrelated impacts of USFS plans and local government policies, opportunities to contribute to common objectives, and ways to reduce conflicts between a Forest Service plan and local policies (36 C.F.R. § 219.4(b)(2)).

While the objectives and priorities of the county may not be consistent with existing management plans or practices of the federal or State of Wyoming government, this plan is consistent with federal and State law.

Organization

This plan considers the current conditions of federal resources, county objectives for each resource, and how the county would like to see those objectives achieved. For each federal resource in the county, this plan addresses the following:

- **Resource Assessment:** This assessment includes background and detailed information on the resource, including qualitative as well as quantitative information. The assessment includes an evaluation of the importance of the resource to the county, location, quality and size, as well as a map of the resource, where appropriate. The Resource Assessment relies on the best data available at the time of publication, though new data collection or research is not required. The Resource Assessment addresses the question, “What is the state of the resource now?”
- **Resource Management Objectives:** Resource Management Objectives describe general goals in the form of broad policy statements regarding the use, development, and protection for each resource. Where applicable, objectives should be stated in measurable terms and include tangible metrics for which resource objectives can be met. This may include quantifiable goals and timelines, where applicable and feasible. Resource Management Objectives address the question, “What does the county want for and from this resource?”
- **Priorities:** This sections describes specific priorities on how to achieve the county’s Resource Management Objective for each resource. Priorities tier to Resource Management Objectives for each resource and address the question, “How would the county like to see its objectives achieved?”

Public Process

We recommend a description of the public process that occurred during the creation of this plan including data gathering, public engagement, document preparation, reviews of drafts, and final adoption by the Board of County Commissioners. The Governor’s criteria recommends that public engagement occur at a minimum in the initial, draft, and final plan development stages. Final plans should include a description of the core substantive issues identified by way of public comments and how, if at all, these issues were addressed in the final plan.

Consistent with Wyo. Stat. § 9-4-218(a)(viii)(D), the county developed this plan in public meetings in accordance with Wyo. Stat §§ 16-4-401 through 16-4-408, allowing for participation and contribution from the public.

This plan is based on criteria developed by the Office of the Governor of the State of Wyoming in consultation with the counties, consistent with Wyo. Stat. § 9-4-218(a)(viii)(B).

Credible Data

We recommend adding this section to the Organization, describing how data was evaluated for this plan and goals for guiding planning decisions.

There are many factors that make a data source credible, but the underlying basis is an assurance that the source is unbiased and supported by evidence. The Information Quality Act (Pub. Law. 106-554, § 515) directed the Office of Management and Budget to require federal agencies to issue formal information quality guidelines that would ensure the quality, objectivity, utility, and integrity of information disseminated by Federal agencies. To satisfy these standards (67 Fed. Reg. 8452, Feb. 22, 2002), the BLM and USFS have each adopted information quality guidelines. The Board of County Commissioners has used credible data in the creation of this plan by the utilization of federal, state, and local publically available data sources, as well as data that meets, at a minimum, the Information Quality Act guidelines. Conversely, the Board expects that all federal agencies will also follow, as required, their respective information quality guidelines to “ensure and maximize the quality, utility, objectivity and integrity of the information that they disseminate [...]” (67 Fed. Reg. 8452, Feb. 22, 2002). To take into account the best available unbiased science in planning efforts, the Board recommends that federal planning efforts:

- Describe how high-quality data (data which is evaluated by rigorous scientific methodology and principles) was considered, appropriately interpreted, and applied in the planning process within the context of the issued being considered;
- Evaluate and disclose substantial uncertainties in that science; and
- Evaluate and disclose substantial risks associated with plan components based on that science.

Updating the Plan

To the extent county resources allow, this plan will be updated

As new information is acquired or resource conditions change/every 10 to 15 years/some other schedule.

Chapter 1: Custom and Culture

We suggest discussing the county's local customs, local culture, and the components necessary for the county's economic stability. This discussion would outline:

- *Major economic uses on federal and state lands that impact the county*
- *Intrinsic uses on federal and state lands that enhance local values*
- *Historic uses of federal and state land that influence economic factors and values*
- *Historic uses of federal and state land that influence the values and customs of surrounding communities*
- *County stability as it has been influenced by major uses throughout the county*

The language below was taken from the existing 2016 Natrona County Development Plan (NCDP). We recommend incorporating these ideas into a fluid discussion that accomplishes the items listed above.

From NCDP Section 7.8 Culture and Custom (page 7-4):

Major land uses on federal and state lands in Natrona County include livestock grazing; harvesting of forest products; oil and gas exploration, production, and associated development; and recreation, which includes a broad spectrum from wilderness and primitive use to developed-area recreation, both motorized and non-motorized. It is this myriad of land use that forms the custom and culture of the citizens of the county. The traditions of its citizens are based on continuing these land uses.

Other important components of federal and state land include the land's inherent value as open space available for use by the public at large; providing habitat for flora and fauna; and its role as a vessel for historical and cultural values associated with human use of the land throughout history.

Natrona County will support the maintenance and enhancement of the custom and culture of the county, and oppose any change in land use that does not evaluate, mitigate, and minimize impacts to custom, culture, and the economic stability of the county.

Federal land managers shall incorporate the social, cultural, and economic needs of the county when developing plans or projects and making recommendations that affect the custom and culture of the county. Furthermore, the consideration process used to assess impacts to county custom and culture shall be cited in federal and state land management plans and the steps taken to incorporate protection of the county's custom, culture and heritage into each plan and project.

Natrona County will review federal and state land use planning issues impacting the county's custom and culture and make recommendations pertinent to the issue in question. Responsible use of federal lands in use that benefits the custom, culture, heritage and economic base of the county.

Federal and state agencies shall notify Natrona County of any actions, proposals, policies, or regulations which may impact the custom and culture of Natrona County will review and comment on federal or state actions which impact the custom and culture of the county.

Local governmental agencies (including county, towns, school districts, public health care providers, and other local agencies) have important and useful data and other information regarding economic and cultural trends that may not be available from state or federal data sources. It is Natrona County's policy that federal and state land managers seek out and take into full account data and information available

from local sources when developing plans and/or making recommendations.

Management of federal lands will recognize valid existing right and interests in federal land. Livestock grazing permits, mineral leases, mining claims, recreation permits, concessionaire contracts, and rights-of-way form the backbone of the county's communities.

DRAFT

Chapter 2: Land Use

Land Use

Resource Assessment

The existing NCDP discusses different types of land use (livestock grazing, harvesting of forest products, oil and gas, recreation, etc.) and the importance of each. For this Resource Assessment, we recommend that baseline data be collected and show approximate ownership acres and acres (including overlapping acres) of each use. We recommend that there be a map and table depicting as such. In addition, we recommend that land ownership data be verified and pulled in from the NCDP, pages 4-9 and 4-10.

The following items were discussed during the kick-off call and we recommend that they be included in this section. We do not recommend that they require specific background data; rather, a short discussion of each.

- 1. Industrial Siting*
- 2. Growth and development of Casper Mountain (this could alternatively or additionally be included under recreation and/or lands access).*
- 3. Shortage of gravel pits for local maintenance.*
- 4. Hazardous waste management*

Resource Management Objectives

It is Natrona County's policy that federal land use planning should:

- Involve a high level of cooperation and coordination;
- Be multi-jurisdictional to the largest extent possible;
- Incorporate the principles of performance-based and adaptive management, while respecting the legal interests and rights granted on federal lands;
- Involve a high level of cooperation and coordination with county agencies to identify, disclose and monitor socio-economic effects;
- Include a large-scale cumulative analysis of effects, temporally and geographically;
- Be based on a holistic view of entire ecosystem, rather than a species-by-species or resource-by-resource approach; and
- Use high quality data evaluated by rigorous scientific methodology and principles.

Priorities

1. For purposes of land use planning efforts and management decisions on federal lands in Natrona County, federal and state agencies shall develop and maintain cooperating agency status for all major federal land management actions.
2. Natrona County expects to enter into a memorandum of understanding (with a two year term, automatically renewable) for all National Environmental Policy Act-related projects or planning document amendments affecting federal lands in Natrona County.
3. Federal agencies shall coordinate with the county as required by federal law. Land management agencies shall consider the effects proposed actions have on (1) community stability; (2) maintenance of custom, culture, and economic stability; (3) conservation and use of the environment and natural resources in the county; and (4) existing multiple uses.

4. Once a decision on a major federal action affecting federal lands is made, federal land management agencies shall document and track follow-up actions to ensure implementation and compliance with this federal and state land use policy.
5. Federal land management planners should review all future planning documents for consistency with Natrona County, Federal, and State Land Use Policy; identify any inconsistencies or conflicts that may exist; and take practical measures to resolve the conflicts to ensure consistency and compliance with this plan; and describe these findings in the planning or other decision documents.

Land Access

Resource Assessment

We recommend collecting baseline data for miles of Revised Statute (RS) 2477 roads, private roads, National Forest System (NFS) roads, and BLM system roads and showing them on a map, as they relate to public land access.

Legally accessible lands (baseline data=acres) were discussed during the kick-off call and we recommend that they be included in this baseline data, as well as a short discussion describing what they are and why they are important.

Resource Management Objectives

- Access to or across federal lands shall not entail encumbrances or restrictions on private property rights or privileges.

Priorities

1. There shall be no closure of existing roads or RS 2477 rights-of-way without scientific justification, support of the Natrona County Board of County Commissioners, and support of the citizens of the affected area.
2. Prior to any road closures on federal land within the county, the deciding officer shall conduct full consultation with the county and local citizens.
3. The development of multiple use trail systems on federal lands in the county shall provide a wide range of recreational opportunities and experiences for all users and shall be permitted, with emphasis on looped trails.
4. Federal land managers shall provide for the development of access on federal lands for the elderly and physically impaired.
5. No roads, trails, rights-of-way, corridors, easements or other traditional access for the transportation of people, products, recreation, energy or livestock may be closed, abandoned, withdrawn, or have a change of use without full public disclosure and analysis.
6. County roads on federal lands shall remain open unless it has been determined by the county that the subject road is no longer needed as part of the county's transportation system.

Wilderness and Other Special Land Use Designations

Resource Assessment

Wilderness is discussed in Section 7.14 in the NCDP, however no baseline data is presented as there are not Wilderness acres. We recommend that the updated NCDP present baseline data (if available) for all special designations including: Wilderness, Wilderness Study Areas (WSAs), Special Recreation

Management Areas (SRMAs), Areas of Critical Environmental Concern (ACECs), and any other special designations for all ownership.

Resource Management Objectives

- The legal requirements and qualifications of the Wilderness Act of 1964 and the Wyoming Wilderness Act of 1984 shall be upheld, including those providing for the continuation of existing uses and the regulation of existing uses only so as to prevent necessary or undue degradation of the environment.

Priorities

1. No additional federal lands in Natrona County are suitable for wilderness designation other than the existing wilderness study areas in the county. Natrona County opposes any such further designations.
2. Natrona County supports the expeditious resolution of pending congressional wilderness designation proposals for BLM Wilderness Study Areas in the county and supports the release of Wilderness Study Areas not recommended for wilderness designation from non-impairment management.
3. There shall be no protective perimeters or buffer zones around wilderness areas. The fact that non-wilderness activities or uses can be seen or heard from within any wilderness area should not, of itself, preclude such activities or uses up to the boundary of the wilderness area.

Fire Management

Resource Assessment

We recommend that a narrative of fire history and management be presented in this section with yearly data within a 10-year timeframe including date, size, and intensity of wildland and prescribed fires (subject to data availability). We suggest analysis of the data based on changes or trends within the county comparative of the state.

Resource Management Objectives

- Fire management strategies shall consider firefighter and public safety and protect human life, property, and communities. There shall be a high level of cooperation between agencies and firefighter organizations in the county.

Priorities

1. Federal agencies will incorporate local fire department plans and policies into fire suppression and control plans.

Forest Management

Resource Assessment

We recommend a discussion in this section relating to the importance of forests and forest management in the county. In addition, we recommend the following baseline data be collected and presented: amount of timber harvested in the last 10 years, fire activity including prescribed fire (or reference Fire Management section), primary wildlife habitats within the forest, and current and/or modeled disease within the geographic limits.

Resource Management Objectives

- The private use of timber products from federal and state lands in Natrona County for fuel, posts and poles, Christmas trees, etc., shall be continued as an allowable use.
- A sustainable wood products industry on federal and state lands in the county is an important aspect of economic diversity.
- Fire, timber harvesting, and treatment programs will be managed in a way to promote forest health, reduce disease and insect infestation and prevent waste of forest products while providing opportunities for local businesses and small business.
- Federal land management agencies should participate in the National Forest County Partnership Restoration Program to formulate a multi-year plan that encompasses: a) Community-based cooperation with stakeholders; b) Integration of best management practices that incorporate peer reviewed science; c) Expedited implementation of forest and watershed enhancement projects at the stand and landscape levels; and d) flexibility in authorities and planning.

Priorities

1. Conservation forestry conclusions and proposals for action should be consistent with the following:
 - Avoid management scenarios that result in a static forest condition;
 - Do not restrict management actions to a particular size or age of wood material;
 - Concentrate activities on current condition as compared to desired condition;
 - Contains an aggressive time table for management implementation;
 - Uses a systemic, diagnostic approach to anticipate forest health problems;
 - Works with and not against nature;
 - Accurately accounts for forest health costs and uses a long term risk analysis;
 - Prepares the forest for inevitable periods of drought and encourages research into climate/forest health relationships and the aforementioned forest management scenarios utilize silviculturally sound harvest of forest products and material to finance non-commercial management prescriptions to meet desired condition or funded in conjunction with local, state and federal programs.

Chapter 3: Geology, Mining and Air

Mining

We recommend this be merged with Mineral resources.

Energy Resources

Resource Assessment

We recommend that baseline data is presented in this section including the following items: miles of pipeline, data on wind and solar development (e.g., amount of energy produced from each, locations of each), oilfield cuttings locations and amount, current or proposed CO2 infrastructure/energy production numbers, and current or proposed gasification infrastructure/energy production numbers.

The data suggested above includes the following items that were discussed during the kickoff call:

1. *CO2 pipeline transmission*
2. *Pipeline Corridors*
3. *Coal gasification*
4. *Tertiary recovery (WyOGC)*
5. *Wind and Solar*
6. *Oilfield Cuttings*
7. *Property for oil and gas mitigation (Conservation Credits)*

Resource Management Objectives

- Natrona County encourages development of wind energy in acceptable areas, consistent with the National Energy policy of 2001 and the Energy Policy Act of 2005.

Priorities

Mining and Mineral Resources

Resource Assessment

We recommend that oil, gas, and other mineral (including bentonite and gravel pits) extraction numbers/locations be presented in this section. We also suggest including discussion on the following items identified during the kick-off call:

1. *Bentonite*
2. *Gravel Pits*

Resource Management Objectives

- Natrona County supports future mineral exploration, extraction and development that are conducted in an environmentally responsible manner (taking into consideration land, air, and water quality and quantity, as well as other resource values) and utilizing public involvement.

Priorities

1. Natrona County encourages industry companies to conduct science-based research applicable to mineral and mining industry expansion and new development.
2. Federal and state land managers should provide consideration to the needs of public and private enterprises relative to gravel, rock for stabilization projects and other material resources. New

gravel pit excavation possibilities should be available on federal and state lands dispersed throughout the county, as well as opportunities for year round gravel crushing and screening operations, in areas where the materials are needed and where it is economically feasible to extract them.

3. Federal and state agencies shall consider the potential economic impact of any proposed land management changes or natural resource related to the minerals industry, and on the residents of the county, through in-depth economic impact descriptions in planning documents.
4. Federal lands shown to have reasonable mineral potential should be open to oil and gas leasing with stipulations and conditions that will protect the lands against undue and unnecessary degradation to other significant resource values. This should include reasonable and effective mitigation and reclamation measures and bonding for such where necessary.
5. Mineral development proposals shall not be approved without complete and proper scientific analysis of the development in compliance of federal environmental laws, regulations and guidelines. The analysis must quantify and disclose all reasonable and foreseeable adverse impacts, offer possible mitigations both on-site and off-site, of the development to all other existing multiple use activities including but not limited to livestock grazing, recreation opportunities, timber harvest, outfitting, hunting, fishing, and to the county's national, economic, socio-economic, and cultural resources.
6. The ability of private mineral owners to access, extract and transport their mineral resource shall not be limited or infringed upon by federal land managers, including in areas determined set aside for no mineral leasing on federal lands.
7. An accurate analysis of full-field development scenarios needs be disclosed at the earliest feasible stage in the planning process.
8. Impacts from the pace of mineral development cumulative impact from all mineral developments in the area, and the impact from a sharp decline in development levels will be fully considered in federal land management decisions involving mineral development.
9. Federal and state agencies shall analyze and consider all fiscal and economic impacts to the minerals industry, the county and other local governments, and to the residents of the county from any proposed land management changes or natural-resource related plans.
10. Planning shall consider up-to-date mineral potential reports.
11. Mitigation plans must include monitoring and incorporation of county and other local governmental roles in the monitoring program and it must be a condition of approving mineral proposals.
12. Each mineral company operator should designate a contact person to handle concerns of Natrona County, livestock permittees and other stakeholders, and share that contact information with the county and its representatives.
13. Natrona County opposes the waste of fluid and gaseous minerals, and recommends such waste be managed to the least negative impact possible.
14. Federal land managers shall aggressively inspect and enforce operating requirements for oil and gas operations since this is critical to the protection of the environment, public health and safety, proper accounting of production, and to ensure oil and gas resources are developed in a manner that maximizes recovery while minimizing waste.

15. Wastewater disposal pits, wastewater disposal reinjection wells, and other mineral industry infrastructure shall be located within the industrialized areas of federal lands and away from fresh water sources.
16. Disposal of garbage and other wastes, as well as road killed-animals, shall be provided for in development planning documents, with the goal to reduce the risk of attracting and expanding populations of ravens and other predators.
17. Transportation planning for industrial projects should occur at the project level rather than at the individual well pad level.
18. Federal land managers shall require the use of environmental best management practices, lease stipulations and other restrictions for oil and gas operations, energy related activities, and other industrial developments, including, but not limited to:
 - Interim reclamation of well locations and access roads soon after the well is put into production;
 - Painting of all new facilities a color that best allows the facility to blend with the background;
 - Design and construction of all new roads to county standards, “no higher than necessary” to accommodate their intended use unless a higher standard is appropriate to control dust and soil erosion; and
 - Final reclamation re-contouring of all disturbed areas, including access roads, to the original contour or a contour that blends with the surrounding topography.
19. Other environmental BMPs, lease stipulations or restrictions should be on a case-by-case basis, depending on their effectiveness, the balancing of increased operating costs vs. the benefit to the public and resource values; the availability of less restrictive mitigation alternatives that accomplish the same objective; and other site-specific factors. Examples of typical, case-by-case BMPs, lease stipulations or restrictions include, but are not limited to, the following:
 - Seasonal drilling restrictions;
 - Avoidance or prohibitions on surface disturbance of sensitive areas (near homes, visual areas, developed recreation sites, migration corridors, grouse leks, rare plant areas, wetlands, crucial winter range, etc.);
 - Paced development and zone development;
 - Cluster of new infrastructure to minimize footprint;
 - Installing raptor perch avoidance;
 - Burying of distribution power lines and/or flow lines in or adjacent to access roads;
 - Centralizing production facilities;
 - Installing submersible pumps;
 - Directional/horizontal drilling;
 - Drilling multiple wells from a single pad/clustered development;
 - Using noise reduction techniques and designs to reduce noise from compressors;
 - Monitoring wildlife;
 - Avoidance placement of production facilities on hilltops and ridgelines;
 - Screening facilities from view or siting facilities to reduce visibility;
 - Use of remote monitoring on wells;
 - Minimizing the foot print of development in overall energy infrastructure;
 - Bioremediation of oil field wastes and spills; and

- Using common utility or right-of-way corridors.
- 20. The use of best available technologies will be required in energy development projects to reduce all pollution impacts during all stages of development.
- 21. The analysis, monitoring of air and water, and identification of health risks associated with energy development will be required, with the costs to be paid for by the industry.
- 22. Except for congressional withdrawals, public lands shall remain open and available for mineral exploration and development unless withdrawal or other administrative actions are clearly justified in the national interest and withdrawal procedures are followed.
- 23. Certain areas of federal land may be withdrawn from mineral leasing in an administrative process, so long as such designation is for the term of a resource planning document, and not a permanent designation.

Air Quality

Resource Assessment

We recommend that baseline data be collected and presented including: a map of monitoring stations, any and all available data for criteria air pollutants (CAPs), description of pollution-contributing sources, data on source contributions, and State and Federal standards compared with Natrona County CAPs emissions.

Resource Management Objectives

- Natrona County supports the purpose of the Clean Air Act Amendments of 1990 which balance the need to ensure the highest level of environmental protection with the need to maintain economically viable and sustainable communities.
- Natrona County supports the goals of the Wyoming Environmental Quality Act, which implements the Clean Air Act, as needed. The Wyoming Department of Environmental Quality establishes emission standards and permit procedures to protect the public health and welfare that are economically achievable.
- Maintaining the county's air quality above state and federal air quality standards is critical to the health and well-being of its residents. A high level of air quality is important to future economic development as it reduces the possibility of development restrictions as a result of air quality standards being exceeded

Priorities

1. Air quality is one of Natrona County's substantive concerns.
2. Wyoming Department of Environmental Quality's recommendations should be followed when the agency documents a significant risk to human health from a proposed project on federal lands.
3. Federal land management agencies shall conduct intensive analysis of any action proposed on federal lands that would, or could, have the effect of changing quality of air resources in the county. Such actions shall be critically considered in relationship to the historic and current uses of air resources in the county by humans, vegetation, livestock and wildlife.
4. Federal agencies shall involve Natrona County in the development of mitigation strategies to reduce air quality impacts. Mitigations must be implemented to reduce or eliminate impacts of activities that are expected to impact air quality and that individually or cumulative result in exceeding state or federal air quality standards.

5. Federal agencies shall involve Natrona County in the development of enforcement strategies and procedures to be implemented in the case of violations. These procedures and enforcement strategies shall be agreed upon before a permit or lease for a proposed activity or project is approved.
6. Federal land management agencies shall coordinate with the county when formulating permitting and leasing stipulations for proposed activities or projects that have significant impacts to air quality. Permitting and leasing stipulations shall include: provisions for the implementation of agreed upon mitigation strategies to reduce or eliminate criteria pollutants where state and federal air quality standards are likely to be violated; and provisions for the implementation of agreed upon enforcement strategies to be implemented in case of a violation.
7. Dust-suppression measures on roads traversing federal lands are required for industrial development projects in order to reduce air quality impacts from traffic.
8. Air quality baselines for the area must be established with the full participation of the county and the Natrona County Conservation District.
9. To maintain high air quality, state and federal agencies will work to protect the area's air from degradation from non-area sources. These non-area sources shall be identified and quantified.
10. Certain criteria pollutants, such as ozone, are not generally emitted directly from a specific source, but are formed from a combination of precursor compounds. Criteria pollutants formed by this process may be in danger of violating air quality standards while the precursor compounds may not be in danger of violation. If the criteria pollutant is likely to exceed Wyoming and/or National Ambient Air Quality Standards, measures for the reduction of the precursor compounds shall be implemented even if they are not likely to exceed standards in and of themselves.
11. All oil and gas field development plans must provide for air quality monitoring. Data development must be coordinated with, and the findings provided to, the board and the Natrona County Conservation District.
12. Any development or expansion of an activity known to have an impact or have reasonably foreseeable impact on air quality shall occur in such a way as to avoid exceeding Wyoming and/or National Ambient Air Quality Standards. The determination of whether or not air quality standards will likely be exceeded will be based on quantitative analysis of data gathered from monitoring and the expected emissions of that development expansion.
13. All air quality studies undertaken by or on behalf of a federal land management agency or the Wyoming department of Environmental Quality must be coordinated with the county and the Natrona County Conservation District.
14. All air quality analyses for proposed federal projects that have any reasonably foreseeable impacts to air quality shall be quantitative unless otherwise approved in writing by Natrona County.
15. Study methods for air quality analysis shall be developed with, and agreed upon by the county. If necessary, a third party consultant approved by the county may be enlisted to complete the required air quality analysis so long as that consultant conforms to the agreed upon methods.
16. Natrona County shall notify any federal land management agency, in writing, of inconsistencies between county policies and procedures regarding air quality and those policies and procedure

of federal guidance, resource management plans and amendments to management framework plans.

17. The individual and cumulative impacts to air quality and the significance thereof, of any proposed actions on federal lands shall be analyzed thoroughly and quantitatively by the federal agency proposing the activity. Analysis of individual and cumulative impacts must be coordinated with, and the findings provided to, the county.
18. Alternatives for a proposed activity on federal lands must be developed with the cooperation of the county.

Soils

Resource Assessment

Because soil data is incredibly variable and vast, we recommend that this section describe the importance of soil health (agriculture, wildlife, water and air quality, etc.) and then tier to the NRCS Web Soil Survey, Natrona County Conservation District Soil Survey, or other comprehensive data sources for available data.

Resource Management Objectives

- The protection of soils from wind and water erosion and the maintenance of productivity and fertility are critical to sustaining a viable agricultural economy, sustain wildlife populations, and high quality of air and water.

Priorities

1. Soil-related activities will be based on all available survey data until a final survey is published. Any deviation from this material and soil data development must be coordinated with the USDA Natural Resources Conservation Service and Natrona County Conservation District.
2. Natrona County supports the prioritization of soil survey mapping and the uniform use of ecological site descriptions developed by the Natural Conservation Service as the foundation for the inventory, evaluation, settling of monitoring objectives, and management of rangelands and forestlands because ecological sites are the basic units of soils and associated plant communities and they provide the basis for setting

Chapter 4: Water Resources

Irrigation and Related Infrastructure

Resource Assessment

We recommend a discussion on why and how irrigation is used, the county's primary water sources, and what related infrastructure means. We also recommend presenting acres of irrigated cropland spatially and in text. As discussed during the kickoff call, this Resource Assessment should include a map of Bureau of Reclamation underground tunnels that provide water resources from Alcova reservoir.

Resource Management Objectives

- Proper management of federal and state land watersheds that supply the majority of the agricultural, domestic, and industrial water use in this water-short area is critical.

Priorities

1. Management and resource-use decisions by federal land management and regulatory agencies concerning the vegetative resources within the county should reflect serious consideration of the proper optimization of the yield of water within watersheds of the county.

Dams and Reservoirs

Resource Assessment

We recommend that the data be presented which show number of dams, number and acres of reservoirs, and the dams/reservoirs' respective watersheds. We recommend that a map accompany this data. As discussed during the kickoff call, Alcova and Pathfinder reservoirs will be included in this assessment.

Resource Management Objectives

Priorities

1. Agency actions must analyze impacts on facilities such as dams, reservoirs, delivery systems, monitoring facilities, etc., located on or downstream from land covered by any water related proposal.

Water Rights

Resource Assessment

We recommend discussing the uses and importance of water rights. Instead of displaying this data in tables or maps, this Resource Assessment will reference the Wyoming State Engineer's Office for specific water right information.

Resource Management Objectives

- It is Natrona County's policy that the Wyoming Constitution and Wyoming statutes are the legal basis for all water use in the county and all planning efforts need to reflect this reality. Specifically, the county recognizes:
 - A water right is a right to use the water of the state, when such use has been acquired by the beneficial application of water under the laws of the state;
 - Beneficial use shall be the basis, the measure and limit of the right to use water at all times;

- Water always being the property of the state, rights to its use shall attach to the land for irrigation, or to such other purposes or object for which acquired in accordance with the beneficial use made; and
- Preferred water uses shall have preference rights in the following order:
 - 1) Water for drinking purposes for both man and beast;
 - 2) Water for municipal purposes;
 - 3) Water for the use of steam engines and for general railway use, water for culinary, laundry, bathing, refrigerating (including the manufacture of ice), for steam and hot water heating plants, and steam power plants; and
 - 4) Industrial purposes.

Priorities

1. Natrona County supports additional water storage facilities on federal and state lands in the county that assure future growth protection of Wyoming's water rights pursuant to the Colorado River Compact.
2. All water rights desired by the federal government must be obtained through the state water appropriations system.
3. Movement toward nationalization of federal control of Wyoming's water resources or rights will be opposed.
4. Privately held water rights should be protected from federal and/or state encroachment and/or coerced acquisition.

Water Quality

Resource Assessment

Water quality baseline conditions are discussed on page 4-7 in the current NCDP. We recommend that water quality baseline conditions be displayed (in tabular form) and discussed. These conditions will be based on the most recent TMDL and 303(d)/305(b) information. In addition, a map depicting groundwater and surface water locations and their quality and/or impairment ratings is recommended.

Resource Management Objectives

- It is Natrona County's policy that protection of the county's groundwater quality and quantity is an issue of utmost importance.
- An adequate supply of clean water is essential to the health of county residents and the continued growth of its economy.

Priorities

1. Baseline water quality sampling and cataloging of that data shall be required for all industrial water wells (including injection wells) drilled on federal or state lands. This information shall be shared with Natrona County.
2. Natrona County shall be officially notified, as an interested party, of all voluntary remediation of contaminated sites on federal and state lands in the county.
3. All oil and gas field development plans must provide for water quality monitoring. The Natrona County Board of County Commissioners and Natrona County Conservation District shall be directly involved in developing monitoring protocol for air quality and water quality. Development must be coordinated with, and the findings provided to the county.

4. Agencies must analyze the effect of decisions on water quality, yields, and timing of those yields. Any action or lack of action, or permitted use that results in a significant or long-term decrease in water quality or quantity will be opposed.
5. The quality and quantity of water shall not be reduced below current levels.
6. Natrona County will support projects that improve water quality and increases quantity and dependability of water supply.

Flood Plains

Resource Assessment

These are covered briefly in other resource sections and it may not warrant their inclusion as major resource areas. They were not sections found in the NCDP, nor brought up during the kick-off call.

Rivers and Streams

Resource Assessment

These are covered briefly in other resource sections and it may not warrant their inclusion as major resource areas. They were not sections found in the NCDP, nor brought up during the kick-off call.

Wetlands

Resource Assessment

These are covered briefly in other resource sections and it may not warrant their inclusion as major resource areas. They were not sections found in the NCDP, nor brought up during the kick-off call.

Riparian Areas

Resource Assessment

These are covered briefly in other resource sections and it may not warrant their inclusion as major resource areas. They were not sections found in the NCDP, nor brought up during the kick-off call.

Wild and Scenic Rivers

Resource Assessment

There are no Wild and Scenic Rivers within Natrona County, so their inclusion as a major resource area is not warranted.

Chapter 5: Wildlife and Fisheries

Fisheries

Resource Assessment

This was not a section in the NCDP. However, based upon several Blue Ribbon fisheries within the county and the importance of fishing along with hunting within the county, we recommend baseline data be collected that presents fishery resources and special designations. Fishing access sites can also be presented. We suggest fisheries special designations along with fishing access be presented spatially, and all other information be presented in tabular form. This section would be referenced by discussion in Chapter 6 in regards to the socioeconomics of fisheries.

Resource Management Objectives

Priorities

Threatened, Endangered, and Sensitive Species

Resource Assessment

We recommend that baseline data be collected that presents the following (if available): Threatened or Endangered species habitat present in Natrona county, sage grouse habitat (core, suitable, transitional, disturbed, unsuitable, winter), and raptor data (species, breeding data/occurrences). Instead of listing animal species that fall under other federal or state designations, this resource assessment should explain federal and state government considerations behind these designations and direct the reader to current listings. Other Special Status Designations may include: BLM and Forest Service Sensitive Species, Species of Concern, Species of Greatest Conservation Need, Management Indicator Species, Migratory Birds, Bald and Golden Eagles, and raptors. In addition, this resource assessment should reference applicable management guideline documents in lieu of or that preclude federal protection (see numbered item 4 under Priorities below).

Resource Management Objectives

Priorities

1. There shall be no introduction or reintroduction of threatened or endangered species into the county unless the county is involved in the effort as a cooperating agency and the county is satisfied with the analysis and mitigation measures.
2. Federal land planning efforts shall differentiate between special statuses species and those finally listed pursuant to the Endangered Species Act because special status species do not require the same level of protection.
3. Once population goals set out in recovery plans have been reached, species shall be delisted.
4. Natrona County supports alternates to listing under the ESA, including conservation plans, initiatives or agreements to address threats to species and their habitats.
5. Decisions to list any species shall be based on quantifiable monitoring data that proves the threat to the species supports listing.
6. Recovery planning efforts for sensitive, threatened, and endangered species shall evaluate, mitigate, and support Natrona County's custom and culture and economic viability.

Wildlife

Resource Assessment

To keep this discussion streamlined, we recommend that data presented in this section relates only to big game species. Background data should include state designated migratory routes (as discussed during kickoff call), acres of habitat, and acres of crucial winter habitat. We recommend this data be presented in table and spatial form.

Resource Management Objectives

- Natrona County supports responsible wildlife habitat preservation, development, and management.

Priorities

1. It is Natrona County's policy that federal agencies shall fully quantify and cause mitigation measures to be adopted that would effectively mitigate impact on Natrona County wildlife populations as a result of energy development.
2. Federal and state land management agencies shall approve the implementation of the recommendations of the Wyoming Brucellosis Coordination Team that pertain to federal and state lands in order to reduce brucellosis in wildlife populations and to reduce the risk of transmitting the disease to cattle herds.
3. It is Natrona County's policy that land management agencies consider wildlife use in the context of healthy range standards.
4. Natrona County supports "Executive Order 13443 of August 16, 2007: Facilitation of Hunting Heritage and Wildlife Conservation" and the provisions requiring federal agencies to:
 - Evaluate the effect of agency actions on trends in hunting participation and, where appropriate to address declining trends, implement actions that expand and enhance opportunities for the public;
 - Consider the economic and recreational values of hunting in agency actions;
 - Manage wildlife habitats on public lands in a manner that expands and enhances hunting opportunities, including through the use of hunting in wildlife management planning; and
 - Work collaboratively with state governments to manage and conserve game species and their habitats in a manner that respects private property right and state management authority over wildlife resources.

Predator Control

Resource Assessment

We recommend listing State-defined predators (i.e. coyote, jackrabbit, porcupine, raccoon, red fox, skunk, stray domestic cat, gray wolf) and their effects on Natrona County resources. In addition, we recommend discussing the intricacies and recent history of the gray wolf.

Resource Management Objectives

Wildlife management efforts shall reduce predation of sensitive species, increase hunting and fishing opportunities within appropriate carrying capacities, decrease game damage conflicts, and generally balance wildlife numbers with other factions representing the custom and culture and multiple use values of the county.

Priorities

1. In carrying out animal damage management activities, federal and state land managers shall:
 - Allow currently recognized methods of predator control, including aerial gunning of predators, as viable options for predator control on federal and state land in the county.
 - Rely upon the USDA Animal and Plant Health Inspection Service, Wyoming Game and Fish Department and Natrona County Predator Management Board to provide the expertise and conduct predator control on public lands, to determine livestock losses, and to determine methodology for animal damage management.
 - As needed, conduct non-predator animal damage management, such as controlling small mammal populations, and necessary environmental analysis and disclosure on federal and state lands.
 - Coordinate with other federal and state agencies to improve effectiveness of control program activities conducted on federal and state lands.
 - Use an integrated approach to the prevention of animal damage and management of animal damage control programs.
 - Consider a full range of methods, including physical barriers, repellents, habitat manipulation, biological controls, silvicultural methods (for example, fertilizing to improve soil fertility), pesticides, and hunting and trapping. Use licensed hunting, fishing, and trapping as a control technique where practicable
2. There shall be no imposition of land use restrictions on federal lands for the purpose of protecting species classified as predators under state statute.

Wild Horses and Burros

Resource Assessment

As there are no herd management areas (HMAs) in Natrona County, we recommend stating as such and keeping this section concise and short. Please note that the absence of HMAs should be confirmed and that any known herd areas should be disclosed in this section.

Resource Management Objectives

- Designation of any wild horse management areas in Natrona County is inappropriate and federal land managers shall provide for the removal of wild horses from federal lands in the county.

Priorities

Invasive Species

Resource Assessment

We recommend that this section be removed from Chapter 5 and addressed (combined) in Noxious Weeds in Chapter 7.

Chapter 6: Economics & Society

Recreation and Tourism

Resource Assessment

This section should include relevant data from IMPLAN/REMI and the Wyoming Economic Analysis as it relates to recreation and tourism. The following items were discussed during the kick-off call and should be discussed qualitatively (referencing the species specific data in Chapter 5) unless there is specific economic data available:

1. *North Platte trout fishing*
2. *Winter recreation*
3. *Fishing and hunting*

Resource Management Objectives

1. Federal lands offer a broad range of recreational opportunities on public lands, including, but not limited to, hunting, fishing, horseback riding, camping, nature appreciation, interpretive trips, wildlife watching, boating, and other tourism-related activities. Federal and state lands also support businesses that offer such opportunities to the public, including outfitters and guides, outdoor camps, wilderness/survival schools, dude ranches, etc.
2. Federal and state land management shall support recreation and tourism and associated businesses in Natrona County, including the broad range of activities included, from off-road vehicle use to primitive outdoor adventures.
3. Federal land outdoor recreational access shall not discriminate in favor of one particular mode of recreation to the exclusion of others.

Priorities

1. Existing levels of motorized public access to traditional outdoor recreational designations in the county shall be continued, including both snow machine and off-highway vehicle use.
2. Traditional levels of group camping, group day use and all other forms of outdoor recreation, motorized and non-motorized, shall be continued.
3. The permitting process for commercial recreational permits on federal lands in the county shall be streamlined and expedited.
4. Permitting of commercial enterprises on federal lands that reflect the custom and culture of the county in terms of recreation and outdoor lifestyle/uses shall be encouraged.
5. Motorized, human, and animal-powered outdoor recreation should be integrated into a fair and balanced allocation of resources within historical and cultural framework of multiple-uses in rural Natrona County, and outdoor recreation should be supported as part of a balanced plan of local economic support and growth.
6. Potential development should include family oriented activities and development that are accessible to the general public and not limited to special interest groups.
7. Recreational facility development that supports and cultivates maintenance partnerships with other entities, agencies and special interest groups shall be encouraged.
8. Outfitting and lodge operations are an important part of local history and tradition as well as contribute substantially to the local economies. Management decisions must be provided for the continuation or expansion of these activities and fully disclose the impacts to them.

9. Existing recreational residences and access to them, on federal lands in Natrona County shall continue to be reauthorized.

Law Enforcement

Resource Assessment

We recommend keeping this section streamlined and presenting the following baseline data: current affiliations, roles and responsibilities, and jurisdictions throughout the county.

Resource Management Objectives.

- Natrona County and the State of Wyoming have primary jurisdiction for law enforcement throughout Natrona County.
- It is Natrona County's policy to provide protection to the public and their property through cooperation with other law enforcement agencies.

Priorities

1. All federal law enforcement activities will be fully coordinated with the Natrona County Sheriff's Office.
2. Natrona County will maximize the use of a cooperative law enforcement program, to improve protection of persons and their property when visiting federal and state lands, and to utilize the opportunity to cooperate with land management agencies in carrying out their specific responsibilities related to the land management.
3. Federal and state land management agencies will make available sites for the strategic location of communications towers to aid in law enforcement activities.

Cultural, Historical, Geological, and Paleontological Resources

Resource Assessment

We recommend that locations and descriptions of designated public cultural and archeological sites be presented spatially. We also recommend a map showing the Potential Fossil Yield Classification (PYFC) for paleontological resources on public lands (if available) which provides an estimate of the potential that significant paleontological resources will be found in a mapped geological unit, and is used by the BLM to assess possible resource impacts and mitigation needs for federal actions.

Resource Management Objectives

- Natrona County supports the protection, and/or excavation of unique archeological features that occur in the county, including the responsible stewardship of these resources through balancing resource protection with visitor values.

Priorities

1. Natrona County recommends that priority be given to retention and display of locally collected artifacts in Natrona County. State and federal agencies should periodically provide public presentations and reports interpreting new information and theories from the cultural and historical sites located on federal and state lands in the county.
2. Natrona County will be recognized by federal agencies as a consulting party as described in Section 106 of the National Historic Preservation Act and subsequent amendments. As a consulting party, Natrona County will request periodic review and comment on classification and management of significant cultural resources on federal lands in the county, and the impact

of proposed land use actions on those sites. Natrona County may also periodically suggest endangered cultural resources that should be classified and managed as more significant.

3. Where practical, federal land management agencies should provide public visitation opportunities to designated public use cultural and archeological sites with sufficient site protection.
4. Federal and state agencies will not jeopardize private property rights or existing land uses, such as oil and gas extraction, mining, logging and harvesting of forest products, road maintenance, and grazing, through the protection of cultural and archeological sites. This can be accomplished by carefully assessing the sensitivity and importance of the site relative to the economic and cultural impacts associated with land management decisions based around cultural and archeological sites in the county. Natrona County realizes there can be a balance of existing uses and the need to protect cultural sites.
5. Potential adverse effects to significant and high quality cultural resources will be managed to the extent possible through avoidance and confidentiality of location before other protections are considered.
6. Many sites represent a unique culture and are closely related to early agricultural settlement of the area. They continue to have historical significance and are held by many residents as reverent or consecrated sites. These sites must be preserved and remain accessible.
7. The maintenance of the resources and their physical attributes such as trails, cabins, livestock facilities, etc., is critical to present and future tourism development.
8. The land, its people, and their heritage form an inseparable trinity for the majority of the area residents and this relationship must be considered in all proposed actions.
9. Livestock grazing, the resulting lifestyles and imprint on the landscapes of the West are some of the oldest enduring and economically important cultural and heritage resources in the West, and must be preserved and perpetuated.

Economic Considerations

Resource Assessment

This section should include relevant data from IMPLAN/REMI through the Wyoming Economic Analysis Division. Data can be gathered from both the Wyoming Regional Economic Analysis Project and Federal Reserve Economic Data (FRED) both found on the Wyoming Economic Analysis Division website. In addition, Natrona County Commissioners can also request specific reports from the University of Wyoming and to the Wyoming Economic Analysis Division via the Wyoming County Commissioner's Association.

Resource Management Objectives

- Natrona County supports efforts to maintain or improve the overall economic base of the county through the judicious use and enjoyment of federal and state lands in the county.
- It is Natrona County's policy that economic diversity and long-term stability are beneficial to the welfare of county residents.

Priorities

1. Natrona County will not support federal and state agencies on land management decisions when economics is not carefully considered in the decision. In such cases, Natrona County may be forced to appeal or seek other relief.

2. Any proposed change in land use must evaluate, mitigate, and minimize impacts to custom and culture and the economic stability of the county.
3. Natrona County recommends federal and state agencies entertain and evaluate opportunities for free trade and enterprise based on their merits and impacts to federal and state lands. While economics should not always be the driving factor in decision making, it should be part of the balance of interests considered.
4. Federal land management agencies must work in tandem with Natrona County to accurately provide socioeconomic impact analysis and provide socioeconomic impact mitigation recommendations to both the agencies overseeing the development as well as county government officials. Agencies overseeing the development should make every reasonable attempt to implement the socioeconomic impact mitigation recommendations while working with local government officials.
5. Any development that will require the employment of more than 250 workers for a period of more than 90 days will incorporate mitigation to compensate for impacts on community services and housing.
6. Natrona County recommends that socio-economic monitoring and analysis be performed by experts familiar with the area's unique history, culture, economy and resources. It is Natrona County's policy that such monitoring and analysis be paid for by the industry creating the impact, and that this requirement be understood by all involved, early in the process.
7. Large employers may also be required to pay impact fees or provide supplemental services to reduce the impacts on county and other services.
8. Federal land management agencies shall notify Natrona County of any action or regulations that affect the economic base of the county; and Natrona County will review and comment on proposed actions significant to the economic base of the county.
9. When a negative impact of a proposed action is unavoidable, provisions should be made to mitigate or compensation for those impacts.
10. It is Natrona County's policy that analysis of proposed major federal actions must include consideration of the following socioeconomic factors:
 - An evaluation of the social and economic conditions in the area of site influence;
 - The social and economic conditions shall be inventoried and evaluated as they currently exist, projected as they would exist, projected as they would exist in the future without the proposed industrial facility and as they will exist with the facility;
 - A study of the area economy including a description of methodology used. The study may include; but is not limited to, the following factors:
 - Employment projections by major sector availability
 - Economic bases and economic trends of the local economy
 - Family and per capita income
 - Purchasing power of earnings within the area of site influence
 - Short and long term fluctuations in resource consumption and resource
 - Employment dislocation and skill obsolescence
 - Diversity of economy
 - Estimates of basic versus non-basic employment
 - Unemployment rates
 - Population, optionally including demographics and projections

- Housing, including quantitative evaluations of the number of units on the area and discussion of vacancy rates, costs, and rental rates of the units
- Transportation
- Governmental facilities
- Sewer and water distribution and treatment facilities
- Solid waste collection and disposal services
- Health and medical care facilities and services
- Human services facilities
- Recreational facilities
- Schools
- Mental health services, problems due to the transition from temporary, consumption employees to operating workforces
- Fiscal analysis over the projection period for all local governments, including revenue structure, expenditure levels, mill levies, and services provided through public financing, and the problems in providing public services
- Estimate of sales and use taxes and ad valorem taxes generated by the proposed activity
- Impact controls and mitigating measures proposed by the applicant to alleviate adverse social and economic impacts associated with construction and operation of the proposed industrial facility

Chapter 7: Agriculture

Livestock and Grazing

Resource Assessment

We recommend that federal and state allotments be presented on a map, and county-wide AUMs be presented in a table. If information is present, showing changes in those AUMs over a period of time could be beneficial for capturing past use and changes in that use.

Resource Management Objectives

- Livestock grazing on federal and state lands in the county shall continue, at levels consistent with custom, culture, and proper stewardship of the vegetative resource.
- The continued viability of livestock operations and the livestock industry should be supported on the federal and state lands within the county by management of land and forage resources, by the proper optimization of animal units months for livestock, in accordance with supportable science and the multiple use provisions of federal and state law.

Priorities

1. Federal land management agencies will not adjust animal unit months (AUMs) on federal lands without scientifically based justification and full consultation between the permittee and administering agency.
2. Federal land management agencies will not permit the relinquishment, transfer or retirement of livestock grazing AUMs in favor of conservation, wildlife or other uses besides livestock grazing.
3. Federal land management agencies will promote public respect for private structures (corrals, fences, water development, etc.) on federal land in an effort to reduce vandalism, educate land users, and promote multiple-use concept.
4. The use of categorical exclusion for issuance or renewal of livestock grazing permits on federal lands should be allowed, if the new grazing permit/lease is consistent with the use specified on the previous permit/lease, such that the same kind of livestock is grazed, this does not exceed the active use previously authorized, and grazing does not occur more than 14 days earlier or later than as specified in the previous permit/lease; and the grazing allotment(s) is meeting land health standards, or not meeting standards due to factors that do not include existing livestock grazing.
5. AUMs should not be placed in a suspended use category unless there is a rational and scientific determination that the conditions of the rangeland allotment or district in question will not sustain the animal unit months proposed to be placed in suspended use.
6. Any grazing AUMs that are placed in a suspended use category can be returned to active use when range conditions improve.
7. Natrona County supports and encourages joint cooperative monitoring programs based on the monitoring Memorandums of Understanding developed between the National Public Lands Council, USDA Forest Service and USDI BLM.
8. State-of-the-art monitoring data should be the basis for grazing management decisions on BLM and Forest Service grazing allotments.
9. Proper Functioning Condition Assessment (PFC) will be used as intended by the National Riparian Team that developed PFC: i.e. proper monitoring protocol and objectives shall be developed and actions shall be implemented when PFC indicates the need.

Noxious Weeds and Invasive Species

Resource Assessment

We recommend that this section include the county and State noxious weed and pest list and any available associated data (priority status if any, infestation estimates, year designated, management tools etc.). We recommend that Invasive Species in Chapter 5 be addressed (combined) here in Chapter 7.

Resource Management Objectives

Federal and state land management agencies shall participate in cooperative efforts with federal, state, county and private land managers to enhance cooperative weed management efforts of Natrona County.

Priorities

1. Early detection and control of noxious or invasive weeds and insect infestations are essential to the public health, welfare and economy of the citizens of Natrona County.
2. Mosquito control on federal and state lands in the county should be permitted in order to reduce the risk of transmission of West Nile Virus and other diseases that pose a threat to the health of humans, livestock and wildlife.

References Cited

BLM. 2012. *A Desk Guide to Cooperating Agency Relationships and Coordination with Intergovernmental Partners*.

Budd-Falen Law Office. 2018. *Local Government Participation in Federal Agency Decision Making*.

DRAFT

List of Appendices

Appendix I

We recommend including IMPLAN/REMI socioeconomic data here.

Appendix II

We recommend listing additional supporting information/resources here.

Appendix III

We recommend summarizing public comments/input here.

DRAFT